

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS**

IN RE:

DAVID G. WALLACE, JR.,

DEBTOR

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CASE NO. 15-31594-H4-7

**TASEER BADAR’S STATEMENT OF COMPLIANCE WITH ORDER COMPELLING
PRODUCTION OF DOCUMENTS TO THE TRUSTEE AND RESPONSE TO MOTION
TO COMPEL AND FOR SANCTIONS**

**TO THE HONORABLE JEFF BOHM
UNITED STATES BANKRUPTCY JUDGE:**

This Court Ordered Mr. Taseer Badar to produce certain documents to the Trustee. As of the date of this filing, although the documents were not in the possession of Mr. Badar, he has complied with the Court’s Order and made the documents available to the Trustee. *See* Exhibit A, Email from Mr. Charles Rubio (confirming that all documents have been produced). Upon producing those documents, the undersigned Counsel asked the Trustee’s counsel to withdraw his Motion to Compel and Sanctions, which Mr. Rubio refused to do. *See* Exhibit A, p. 2. Accordingly, Mr. Badar files this Statement of Compliance with the Court’s Order and requests that the Court Deny the Trustee’s Motion to Compel and for Sanctions.

I. Statement of Compliance

1. Mr. Badar, through counsel, produced documents in response to the Trustee’s written request. He has also produced the documents specified in this Court’s Order of August 19, 2015. The Trustee’s counsel has confirmed receipt of all documents covered by the Order. Exhibit A.

II. Response to the Motion to Compel and for Sanctions

2. Despite the fact that the undersigned counsel informed Mr. Rubio that the corporate

documents contained in this Court's Order would be produced to the Trustee as soon as they could be assembled, he chose to file a Motion to Compel and even requested sanctions against Mr. Badar.

3. What the Trustee has never informed this Court is that the documents contained in the Court's August 19, 2015, Order were never requested from Mr. Badar. The first word Mr. Badar received that the Trustee sought the documents at issue was when the form of order was submitted to the Court. Rather than challenging the Order, or objecting to the fact that the documents at issue were never requested, and without asserting the objection that Mr. Badar did not have possession, custody, or control over the documents, Mr. Badar assured the Trustee that the voluminous documents would be compiled from the files of ten different companies and provided to the Trustee. The documents were provided within five business days of the signing of the Order.

4. Mr. Badar believes that he has behaved more than reasonably and that it is inappropriate for the Trustee to have sought sanctions against him in this matter.

III. Relief Requested

5. Because the documents at issue have been produced, and because there was no request made by the Trustee to Mr. Badar for the documents, and because there is no basis for sanctions, Mr. Badar requests that the Court DENY the Trustee's Motion to Compel and for Sanctions.

Respectfully submitted,

/s/ C. Thomas Schmidt
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ATTORNEY IN CHARGE FOR TASEER
BADAR

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Certification of Compliance and Response to Motion to Compel has been served upon all interested parties by postage paid United States mail or electronically by the Court on this 27th day of August, 2015.

/s/ C. Thomas Schmidt
C. Thomas Schmidt